

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LORENZO SANTIAGO SALAS,

Plaintiff,

vs.

PPG ARCHITECTURAL FINISHES, INC., a
Delaware Corporation; HOMAX PRODUCTS,
INC., a Washington Corporation; SHIELD
PACKAGING OF CALIFORNIA, INC., a
California Corporation; and, JOHN DOES 1-3,

Defendants.

NO. C17-1787 RSM

STIPULATION AND ORDER
EXTENDING THE DISCOVERY
DEADLINE FOR THE DEPOSITION
OF DEFENDANT SHIELD
PACKAGING OF CALIFORNIA, INC.

STIPULATION

COME NOW the parties hereto, by and through their respective counsel of record, and hereby stipulate to entry of an order authorizing the parties to conduct the deposition of defendant Shield Packaging of California, Inc. ("Shield")'s F.R.C.P. (30)(b)(6) witness shortly after the discovery deadline set forth in the Court's Order Setting Trial Date and Related Dates (Doc. #11). The requested variance from the existing scheduling order is sought for this deposition only, and the parties have agreed that the deposition may take place on October 30, 2018, should the Court so allow. The parties request leave of Court to accommodate the availability of Shield's designee, who resides and works in Southern California, and the respective litigation and travel schedules of counsel.

RESPECTFULLY SUBMITTED THIS 28th day of September, 2018.

Martens + Associates | P.S.

Mendez Law Group, PLLC

By: /s/ Richard L. Martens
Richard L. Martens, WSBA #4737
Jane J. Matthews, WSBA #41729
Angeli-Ann Punzalan Kim, WSBA #49836
Attorneys for Defendants PPG Architectural
Finishes, Inc. and Shield Packaging of
California, Inc.
Email: rmartens@martenslegal.com
jmatthews@martenslegal.com
apunzalan@martenslegal.com
Telephone: (206) 709-2999
Fax: (206) 709-2722

By: /s/ Damian S. Mendez
Damian S. Mendez, WSBA #36157
Of Attorneys for Plaintiff
Email: damian@damianmendezlaw.com
Telephone: (206) 290-5148
Fax: (206) 260-9010

ORDER

THIS MATTER having come before the Court on the parties' stipulation, and the Court having considered the Stipulation herein, IT IS HEREBY ORDERED that the discovery deadline set forth in the Court's Order Setting Trial Date and Related Dates (Dkt. #11) is extended to October 30, 2018, for the sole purpose of taking the Fed. R. Civ. P. 30(b)(6) deposition of defendant Shield Packaging of California, Inc.

DATED this 12th day of October 2018.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

Martens + Associates | P.S.

Mendez Law Group, PLLC

By: /s/ Richard L. Martens
Richard L. Martens, WSBA #4737
Jane J. Matthews, WSBA #41729
Angeli-Ann Punzalan Kim, WSBA # 49836
Attorneys for Defendants PPG Architectural
Finishes, Inc. and Shield Packaging of
California, Inc.
Email: rmartens@martenslegal.com
jmatthews@martenslegal.com
apunzalan@martenslegal.com
Telephone: (206) 709-2999

By: /s/ Damian S. Mendez
Damian S. Mendez, WSBA #36157
Of Attorneys for Plaintiff
Email: damian@damianmendezlaw.com
Telephone: (206) 290-5148
Fax: (206) 260-9010